

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 21-2989-MDL-ALTONAGA/Torres

In re:

**JANUARY 2021 SHORT SQUEEZE
TRADING LITIGATION**

This Document Relates to:

**Austin Schaff v. Robinhood Markets, Inc., et al.
Case No: 1:21-cv-21264-CMA**

MOTION TO WITHDRAW AS COUNSEL FOR NAMED PLAINTIFF

Pursuant to Local Rule 7.1 and 11.1 (d)(3)(A), the Law Firm of Wenzel Fenton Cabassa, P.A. and Brandon J. Hill, Luis A. Cabassa, and Amanda E. Heystek, (collectively “WFC Attorneys”), hereby file this motion to withdraw as counsel for Named Plaintiff, Austin Schaff (“Mr. Schaff”), in this action. The undersigned was retained by Mr. Schaff to represent him in the above-styled case. However, as explained below, WFC now respectfully moves to withdraw. In support thereof, WFC states as follows:

SUPPORTING FACTS

1. Rule 4-1.16(b), Rules Regulating the Florida Bar, states that a lawyer may withdraw from representing a client if withdrawal can be accomplished without material adverse effect on the interests of the client, or if the client insists on pursuing an objective that the lawyer considers repugnant or imprudent, or if the representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client, or if other good cause for withdrawal exists.

2. The comments to Rule 4-1.16 state that “The court may request an explanation for the withdrawal, while the lawyer may be bound to keep confidential the facts that would constitute

such an explanation. The lawyer's statement that professional considerations require termination of the representation ordinarily should be accepted as sufficient.”

3. Professional considerations require termination of the representation in this case. Plaintiff does not object to the withdrawal of the undersigned counsel.

4. Good cause for withdrawal exists, as the Court dismissed the instant Class Action through the Court’s Order, entered January 26, 2022. A Notice of Appeal was subsequently filed.

5. Moreover, withdrawal can be accomplished without material adverse effect on the interests of the aforementioned Named Plaintiff, Mr. Schaff.

6. Because the Rules Regulating the Florida Bar anticipate that the undersigned counsel may withdraw under the circumstances presented by the facts in this case, and because the aforementioned Named Plaintiff, Mr. Schaff, will not be prejudiced by the withdrawal of the undersigned counsel, the undersigned counsel respectfully requests that this Court permit the WFC Attorneys to withdraw from representing the aforementioned Named Plaintiff, Mr. Schaff, in this case.

7. Austin Schaff’s most recent contact information is 225 2nd St NW, Apt. 1203, Canton, Ohio 44702.

WHEREFORE, for the reasons set forth herein, the undersigned counsel respectfully requests that this Court permit them to withdraw from this case.

Dated this 23rd day of May, 2023

Respectfully submitted,

/s/ Brandon J. Hill

BRANDON J. HILL

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ATTORNEYS FOR NAMED PLAINTIFF

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of May, 2023 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Brandon J. Hill

BRANDON J. HILL